

EXHIBIT 13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of DEPOSIT INSURANCE
AGENCY for an order to conduct discovery for use
in a foreign proceeding.

Petitioner.

Case No.

EX PARTE PETITION

Upon the declaration of Mary E. Flynn dated October 26, 2017 (“Flynn Declaration”), the declaration of Daria Diachenko dated October 25, 2017 and the accompanying Memorandum of Law, Petitioner, Deposit Insurance Agency (“Petitioner”), hereby applies to this Court *ex parte* for an Order pursuant to 28 U.S.C. § 1782 and Rules 30 and 45 of the Federal Rules of Civil Procedure, (i) granting Petitioner leave to serve Sergey Leontiev (“Leontiev”) with the subpoena *duces tecum* and *ad testificandum* annexed to the Flynn Declaration as Exhibit A; (ii) requiring Leontiev to produce responsive documents to such subpoena *duces tecum* within 30 days of receiving service of such subpoena *duces tecum*; (iii) requiring Leontiev to appear for deposition within 60 days of service of such subpoena *ad testificandum*; and (iv) for such other relief as the Court deems proper and just.

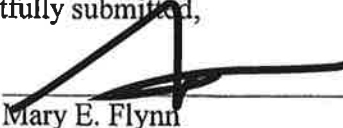
The requested relief is for purposes of obtaining limited, but critical, discovery in connection with a bankruptcy proceeding in the Commercial Arbitrazh Court of Moscow in Moscow, Russia (the “Russian Bankruptcy Proceeding”). In sum, as set forth in the accompanying Memorandum of Law and Declarations, Petitioner seeks discovery from Leontiev concerning his personal knowledge of the financial condition of and related transactions engaged in by Probusinessbank, a large Russian commercial bank. Petitioner is a party to the Russian Bankruptcy Proceeding and thus an “interested person” pursuant to Section 1782. Leontiev resides and is found within this District. Petitioner thus meets all statutory criteria for the issuance of an Order allowing the requested discovery pursuant to 28 U.S.C. § 1782. Moreover,

as set forth in the Memorandum of Law filed concurrently herewith, all of the discretionary factors that this Court may consider likewise favor granting this Petition.

Dated: October 26, 2017
New York, New York

Respectfully submitted,

By:



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